

EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*,

Plaintiffs,

-v.-

JOSHUA MAST, *et al.*,

Defendants,

and

UNITED SECRETARY OF STATE
ANTONY BLINKEN, *et al.*

Nominal Defendants.

CIVIL NO: 3:22-cv-00049-NKM-JCH

**DEFENDANT RICHARD MAST'S FIRST SET OF REQUESTS FOR
PRODUCTION TO PLAINTIFFS JOHN DOE AND JANE DOE**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiffs, by counsel, propound the following Requests for the Production of Documents to Plaintiffs "John Doe" and "Jane Doe."

I. DEFINITIONS AND INSTRUCTIONS

For the purpose of these Requests for Production of Documents, the following terms and instructions shall apply:

1. The terms "Person" and "Entity" shall mean any natural Person or Persons and any other cognizable entity, including without limitation, corporations, proprietorships, joint ventures, partnerships, units, businesses, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies, orders, any other form of business organization or arrangement, or any other form of public, private or legal entity.

2. The term "Document" shall be construed in its broadest sense in light of Federal Rule of Civil 34 and includes without limitation any written, printed, typed, recorded, electronic, or graphic matter of every type and description, however and by whoever prepared,

24. The term “Electronically Stored Information” or “ESI” refers to, without limitation, all electronic data (including reasonably accessible active, archival, or backup data, such as backup tapes, distributed data, electronic mail, forensic copies, metadata, and residual data) stored in any medium from which information can be reasonably obtained.

25. In producing ESI or data in machine-readable form in response to any Request, provide such information or data in a form that is reasonably usable, including at a minimum (i) Bates- numbered TIFF images of the ESI, (ii) searchable text of the ESI in a format compatible with industry-standard litigation-support applications, and (iii) a compatible load file. Produce Excel files, PowerPoint files, databases, and media files in their native forms. For all ESI produced, include for each item the metadata that can be reasonably extracted from the ESI. Hardcopy paper Documents that can be copied legibly should be produced in an ESI format, by scanning the Documents, and should include for each such Document extracted/OCR text data files using a scanning setting of at least 300 DPI. Unitization for any Documents You produce shall be maintained as it was in the original Document.

26. For each Document produced in response to these Requests, identify (i) the custodian of the Document, if collected from You, or (ii) the source of the Document, if obtained from a third party in the course of Your investigation, including the name and address of the third party.

27. If You have no Documents responsive to a particular Request, You shall state that You have no Documents responsive to that Request.

28. If You or Your counsel asserts that any requested Document is privileged or otherwise protected from discovery, You shall supply the following for each Document for which the assertion is made: (i) the date of the Document; (ii) the name and organizational position, if any, of each sender; (iii) the name and organizational position, if any, of each